

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 11-10212-JLT
)	
1. JOHN WILLIS)	
a/k/a "Bac Guai John")	
2. BRANT WELTY)	
3. PETER MELENDEZ)	
a/k/a "Shrek")	
4. AIBUN ENG)	
5. BRIAN BOWES)	
6. KEVIN BARANOWSKI)	
7. MICHAEL CLEMENTE)	
a/k/a "Ricky Martin")	
8. MICHAEL SHAW)	
9. MARK THOMPSON)	
10. STEVEN LE a/k/a "Little Stevie")	
11. VINCENT ALBERICO)	
12. BRIDGET WELTY)	
13. ANEVAY DUFFY)	
a/k/a "Homegirl")	
)	
Defendants.)	

JOINT STATUS REPORT

Pursuant to Local Rule 116.5(A), the United States of America and the defendant submit this joint status report in advance of the Interim Status Conference scheduled for October 25, 2011.

1. Additional Discovery

The government continues to produce discovery. Specifically, the government has produced and is producing discovery regarding the related cases of United States v. Minh Cam Luong, et al., Cr. No. 11-10251-PBS, and United States v. Wei Xing Chen, Cr. No. 11-10252-NMG; additional outstanding materials relative to this case, such as reports of searches; and

additional matter limited to individual defendants, such as booking statements and advice of rights forms. The government also produced its own index of global discovery as an aid to defense counsel in their review of the material and has made available single, searchable pdf's of all of the Title III interceptions in the investigation. The government also anticipates making an early production of some Jencks Act material, including selected agents' reports.

The defendants reserve the right to file for additional discovery in response to the government's productions.

2. Discovery Motion Schedule

The parties propose the following schedule for discovery motions, to be discussed at the hearing:

February 15, 2012	Defendants' discovery letter due
March 7, 2012	Government's letter in response due
March 28, 2012	Defendants' discovery motion due
April 18, 2012	Government's opposition due

This schedule would allow the parties necessary time to complete production and review of the discovery. Any discovery issues would then be briefed for resolution at the Interim Status Conference on April 25, 2012.

3. Expert Discovery

The parties have not agreed on a schedule for production of expert discovery or resolution of expert discovery issues. The government suggests that the Court postpone such resolution until the interim status conference of January 25, 2012, as it had originally proposed.

5. Speedy Trial Act Calculations

The parties have conferred on the periods excludable from all Speedy Trial Act calculations. On July 27, 2011, the Court entered an order of excludable delay, excluding the time from the date of the initial status conference (July 25, 2011) through the date of the interim status conference (October 25, 2011). Accordingly, zero days have been counted and 70 days remain under the Speedy Trial Act.

6. Anticipated Trial

The parties believe that it is still too early to determine whether a trial in this matter will be required. The United States estimates that, as the case is currently constituted, a trial would last three to four weeks.

7. Interim Status Conference

The Court previously scheduled the next interim status conference for January 25, 2011.

Respectfully submitted,

JOHN WILLIS

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R. Bradford Bailey
Counsel for John Willis

BRIAN BOWES

By: Liam D. Scully
Liam D. Scully
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By: Mark D. Smith
Mark D. Smith
Counsel for Bridget Welty

ANEVAY DUFFY

By: Timothy Watkins
Timothy Watkins
Counsel for Anevay Duffy

Dated: October 25, 2011

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Timothy E. Moran
Timothy E. Moran